

# Issue Brief

FEDERAL ISSUE BRIEF • March 21, 2017

## Medicare Delays Further, Start of EPM Bundling Model Program

The Centers for Medicare and Medicaid Services has issued an interim final rule with comment period that delays the implementation date of its “Advancing Care Coordination Through Episode Payment Models; Cardiac Rehabilitation Incentive Payment Model; and Changes to the Comprehensive Care for Joint Replacement Model” originally published in the Jan. 3, 2017, *Federal Register* which had an effective date of Feb. 18, 2017. The rule appears in the March 21 *Federal Register*.

This is the second time CMS is delaying the rule. The rule was first delayed until March 21, 2017. This delay moves the March 21 date to May 20, 2017.

This IFC also delays the applicability date of the regulations that were to be applicable on July 1, 2017, to an applicability date of Oct. 1, 2017, and delays the effective date of conforming changes to CJR provisions that were to be effective July 1, 2017, to Oct. 1, 2017. These delays postpone the applicability of the EPMs and the CR Incentive Payment model, as well as the date on which conforming changes to the CJR model regulations take effect for an additional three months. The new start date will now be Oct. 1, 2017.

### COMMENT

CMS says the delay is “to allow time for additional review, to ensure that the agency has adequate time to undertake notice and comment rulemaking to modify the policy if modifications are warranted, and to ensure that in such a case participants have a clear understanding of the governing rules and are not required to take needless compliance steps due to the rule taking effect for a short duration before any potential modifications are effectuated.”

However, do not be surprised if the rule is delayed again. CMS is seeking comments on a longer delay of the applicability (model start) date, including to Jan. 1, 2018.

Analysis provided for MHA  
by Larry Goldberg,  
Goldberg Consulting

4712 Country Club Drive  
Jefferson City, MO 65109

P.O. Box 60  
Jefferson City, MO 65102

573/893-3700  
[www.mhanet.com](http://www.mhanet.com)

